Air Pollution Control District Jefferson County, Ky 15 January 2000 TITLE V PERMIT SUMMARY

Facility Name: Sam Meyers, Inc., 3400 Bashford Ave Court, Louisville, Kentucky 40218

Address: 3400 Bashford Avenue Court, Louisville, Kentucky 40218

Date Application Received: 04 January 1995 **Date Admin. Complete:** 08 June 1995

12 November 1999 17 November 1999

Date of Draft Permit: 21 November 1999 **Date of Proposed Permit:** 21 November 1999

District Engineer: Don E. Sanders **Permit No.:** 91-97-TV

Plant ID: 0989 **SIC Code(s):** 7216 **NAICS**: 81232 **AFS No:** 00989

Introduction:

This permit will be issued pursuant to: (1) District Regulation 2.16, (2) Title 40 of the Code of Federal Regulations Part 70, and (3) Title V of the Clean Air Act Amendments of 1990. Its purpose is to identify and consolidate existing District and Federal air requirements applicable to Sam Meyers, Inc. and to provide methods of determining continued compliance with these requirements.

Jefferson County is classified as an attainment area for sulfur dioxide, nitrogen oxides, carbon monoxide, lead, PM, and PM $_{10}$; unclassifiable for PM $_{2.5}$, and is a moderate non-attainment area for ozone.

For Title V permitting purposes, Sam Meyers is organized in four Emission Units, consisting of: U1 - petroleum solvent dry cleaning operation; U2, U3, and U4 - perchloroethylene dry-to-dry, dry cleaning operations.

Application Type/Permit Activity:

[X	(J In	itial Issuance		
Permit Revision				
	[] Administrative		
	[]Minor		
	[]Significant		
Γ	1 P	ermit Renewal		

Compliance Summary: [X] Compliance certification signed [] Compliance schedule included [] Source is out of compliance **I.** Source Description: 1. Class I Area Impacts: This source is not located in or near a Class I area. 2. Product Description: Sam Meyers performs dry cleaning using both petroleum solvent and perchloroethylene. **3. Overall Source Process Description:** The source receives and dry cleans the garments. 4. Site Determination: There are no other facilities which are contiguous or adjacent and under common control. 5. Emission Unit Summary U1: Consists of one Stoddard solvent dry cleaning unit **U2:** Consists of one dry-to-dry perchloroethylene unit. **U3:** Consists of one dry-to-dry perchloroethylene unit. **U4:** Consists of one dry-to-dry perchloroethylene unit. 6. Applicable Requirements [] PSD [] NSPS [X] SIP [] NSR [] NESHAPS [X] District [X] MACT [] Other

7. Title V Major Source Status by Pollutant

Pollutant	Actual Emissions 1998 Data (tpy)	Major Source Status ¹
СО	< 1	No
NO_X	< 1	No
SO_2	< 1	No
PM	< 1	No
VOC	38.30	Yes
Perchloroethylene	9.90	Yes

¹Based on Potential to Emit

II. Regulatory Analysis

- 1. Emission and Operating Caps: Sam Meyers is not subject to any plant-wide emission or operating caps.
- **2. Compliance Status:** The source signed and submitted a Title V compliance certification in its permit application.
- **3. Operational Flexibility:** The source did not request to operate under any alternative operating scenarios in its Title V Permit Application.
- **4. Periodic Monitoring, Recordkeeping and Reporting Requirements:** The source is required to monitor and maintain records of various operating parameters to demonstrate ongoing compliance with all applicable District Regulations. The District has determined that VOC compliance monitoring required under Regulation 1.05 is sufficient to demonstrate ongoing compliance with the VOC emission limits specified in Regulation 6.24 for Emission Unit U1. The monitoring, recordkeeping, and reporting requirements specified in 40 CFR Part 63, Subpart M will adequately demonstrate ongoing compliance for Emission Units U2, U3 and U4.

5. Off-Permit Documents

The District considers an "off-permit document" as a document on which a source's compliance with given regulation(s) is contingent or which contains regulatory requirement(s), but is only referenced in a source's Title V Operating Permit. The designation "off-permit document" shall be made at the District's discretion, and may include, but not be limited to, documents such as Regulation 1.05 VOC compliance plans, Preventative Maintenance Program (PMP), Management Of Change System (MOCS); or other documents which are too voluminous to place in the permit.

There are no off permit documents associated with this permit.

- 6. Emission Unit U1 was manufactured and installed in Jefferson County at another plant prior to December 14, 1982, and subsequently purchased and installed by Sam Meyers, Inc in 1994 at the Bashford Ave Court facility; therefore, Emission Unit U1 is not subject to 40 CFR Part 60 Subpart JJJ.
- **7.** Perchloroethylene Dry Cleaning facilities are specifically exempt from Regulations 5.11 and 5.12.

III. Other Requirements:

- 1. **Temporary Sources:** The source did not request to operate any temporary sources.
- **2. Short Term Activities:** The source did not report any short term activities.

- **3.** Compliance Schedule/Progress Reports: The source is in compliance with all applicable requirements, therefore, no compliance schedule or progress reports are necessary.
- **4. Emissions Trading:** The source does not participate in emissions trading and has no existing Emissions Bank credits.
- **5. Acid Rain Requirements:** The source is not subject to the Acid Rain Program.
- **6. Prevention of Accidental Releases 112(r):** The source does not manufacture, process, use, store, or otherwise handle one or more of the regulated substances listed in 40 CFR 68 Subpart F and District Regulation 5.15 in a quantity in excess of the corresponding specified threshold amount.
- **7. Stratospheric Ozone Protection Requirements:** The source does not manufacture, sell, distribute, or otherwise use any of the chemicals listed under Title VI of the CAAA.
- **8. Insignificant Activities:** The following activities have been determined by the District to be insignificant.

Description	Basis	
1- Natural Gas Boiler < 10 MM BTU/Hr input	Regulation 2.02, section 2.1.1	